

FMC Corporation

FMC Idaho LLC
PO Box 4111
Pocatello Idaho 83205-4111
(208) 236-8200

1009518
FF179 RA
11/25/02 cc: PRA
WCH
OCREES

RECEIVED

NOV 26 2002

OFFICE OF THE EXECUTIVE

FMC Idaho LLC

November 25, 2002

Mr. John Iani
Regional Administrator
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Subject: Modification of Drum Storage Unit Closure Plan
FMC Idaho LLC
EPA ID No. IDD 070929518

Dear Mr. Iani:

The purpose of this letter is to notify EPA and the Tribes of some minor changes to the EPA-approved Drum Storage Unit Closure Plan. FMC has determined that the Drum Storage Unit (DSU) is no longer needed and plans to permanently decommission the DSU as part of closure (the Closure Plan originally contemplated reusing the DSU as a 90-day storage area).

Specifically, FMC has modified Section 3.1, Section 4.6.1 and Appendix B, Section 3.2.2 of the Drum Storage Unit Closure Plan to reflect changed conditions recognized during final planning prior to execution of the DSU closure field activities, as described below:

- Section 3.1 Plan Summary Description:

Delete the third bullet that reads "*Repair any cracks or breaks in the secondary containment with water-proof sealant. (As of July 2000, there were no cracks or breaks in the concrete; also, the sealant was patched in July 2000.)*" This modification reflects FMC's intent to permanently discontinue use of and remove the DSU so there is no need to repair cracks or breaks after decontamination.

- Section 4.6.1 Disposal of Liquid Waste:

Replace the existing third sentence that reads "*If the wastewater is determined to be non-hazardous, it will be routed to tank V-3600 for reuse as ICW.*" with "*If the wastewater is determined to be non-hazardous, it will be managed on-site.*" This

FILE COPY

modification is necessary because the Plant has been shutdown; Tank V-3600 has been drained, cleaned, and isolated; and there is no possibility for water reuse. All water used for closing the DSU will be containerized, characterized, and disposed of in accordance with RCRA requirements.

- Appendix B – Sampling and Analysis Plan for Drum Storage Unit Closure Activities, Section 3.2.2 Soil Samples:

Replace the existing fourth sentence of the second paragraph that reads "*Samples will be collected by coring through the secondary containment.*" with "*Samples will be collected by coring through the secondary containment or after removal of a part of or all of the secondary containment slab.*"

Delete the existing sixth sentence of the second paragraph "*Core holes will be repaired with concrete and resealed with sealant comparable to the existing sealant as soon as practical after collection of samples.*" This modification reflects FMC's intent to permanently discontinue use of and remove the DSU.

Please feel free to contact me at (208) 236-8216 should you have questions regarding this information.

Very truly yours,



Rob J. Hartman
FMC Corporation

cc: Andrew Boyd, EPA w/ enclosure
Linda Meyer, EPA w/ enclosure (2)
Roger Turner, Shoshone Bannock Tribes w/ enclosure
Jeanette Wolfley, Shoshone Bannock Tribes w/ enclosure

11/27/02